

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS
CORPORATION, *et al.*¹

)
)
) Chapter 11

)
) Case No. 20-22476-mg

)
) (Jointly Administered)
)
)

**JOINT STIPULATION AND ORDER BETWEEN MOVIE COMPANY CLAIMANTS
VOLTAGE HOLDINGS, LLC; UNION PATRIOT CAPITAL MANAGEMENT, LLC;
VENICE PI, LLC; BEDEVILED, LLC; MON, LLC; COLOSSAL MOVIE
PRODUCTIONS, LLC; WWE STUDIOS FINANCE CORP; TBV PRODUCTIONS, LLC;
RISE UP, LLC; STATUS UPDATE LLC; MORGAN CREEK PRODUCTIONS, INC.;
SHOCK AND AWE, LLC; DEFINITION DELAWARE LLC; FUN MOM DINNER, LLC;
DEAD TRIGGER MOVIE, LLC; YAR PRODUCTIONS, INC.; GUNFIGHTER
PRODUCTIONS, LLC; ACE IN THE HOLE PRODUCTIONS, LP; SF FILM, LLC; THE
REST OF US, INC.; DALLAS BUYERS CLUB, LLC; EVE NEVADA, LLC; AFTER II
MOVIE, LLC; WONDER ONE, LLC; AND DEBTOR**

1. WHEREAS, on April 14, 2020, Frontier and certain of its direct and indirect subsidiaries and affiliates (collectively, “Debtors”) voluntarily filed petitions under Chapter 11 of the United States Bankruptcy Code in the Southern District of New York, jointly administered under Case No. 20-22476 (the “Bankruptcy Case”);

2. WHEREAS, on August 21, 2020 Debtors filed their *Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [ECF No. 984] (the “Plan”) in the Bankruptcy Case;

3. WHEREAS, on August 27, 2020, the Bankruptcy Court entered an Order in the Bankruptcy Case confirming the Plan;

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftc>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

4. WHEREAS, on the below claim filing dates, certain Movie Company Claimants (“MCCs”) filed proof of claims in the Bankruptcy Case asserting general unsecured claims in the below listed amounts based on theories of *inter alia* secondary copyright infringement with respect to the listed movies (the “Voltage Works”) by the below claim numbers (the “Voltage Claims”);

Claim No.	Movie Title	Claimant	Amount	Claim Filing Date	Claim Type
2169	Fathers & Daughters, Pay the Ghost, The Cobbler, Good Kill, The Necessary Death of Charlie Countryman, The Company you Keep A Family Man f/k/a Headhunter's Calling, The Lady Bloodfight, I.T., Revolt f/k/a Prisoners of War, Extremely Wicked Shockingly Evil	Voltage Holdings, LLC	\$1,675,000.00	7/15/2020	Pre-Petition
2177	Wild Horse	Union Patriot Capital Management, LLC	\$152,500.00	7/15/2020	Pre-Petition
2128	Once Upon A Time in Venice f/k/a Going Under	Venice PI, LLC	\$152,500.00	7/15/2020	Pre-Petition
2132	Bedeviled	Bedeviled, LLC	\$152,500.00	7/15/2020	Pre-Petition

2150	Singularity, Welcome Home	MON, LLC	\$302,500.00	7/15/2020	Pre- Petition
2167	Colossal	Colossal Movie Productions, LLC	\$152,500.00	7/15/2020	Pre- Petition
2119	Eliminators	WWE Studios Finance Corp	\$152,500.00	7/15/2020	Pre- Petition
2192	I Feel Pretty	TBV Productions, LLC	\$152,500.00	7/15/2020	Pre- Petition
2121	Between Worlds	Rise Up, LLC	\$152,500.00	7/15/2020	Pre- Petition
2129	Status Update	Status Update LLC	\$152,500.00	7/15/2020	Pre- Petition
2163	All Eyes on Me	Morgan Creek Productions, Inc.	\$152,500.00	7/15/2020	Pre- Petition
2125	Shock and Awe	Shock and Awe, LLC	\$152,500.00	7/15/2020	Pre- Petition
2269	The Professor and the Madman	Definition Delaware LLC	\$152,500.00	7/16/2020	Pre- Petition
2264	Fun Mom Dinner	Fun Mom Dinner, LLC	\$152,500.00	7/16/2020	Pre- Petition
2228	Dead Trigger	Dead Trigger Movie, LLC	\$152,500.00	7/16/2020	Pre- Petition
2236	Distorted	YAR Productions, Inc.	\$152,500.00	7/16/2020	Pre- Petition
2237	Disturbing the Peace	Gunfighter Productions, LLC	\$152,500.00	7/16/2020	Pre- Petition
2233	Look Away	Ace in the Hole Productions, LP	\$152,500.00	7/16/2020	Pre- Petition
2193	SKIN	SF Film, LLC	\$152,500.00	7/16/2020	Pre- Petition
2235	The Rest of Us	The Rest of Us, Inc.	\$152,500.00	7/16/2020	Pre- Petition
2511	Dallas Buyers Club	Dallas Buyers Club, LLC	\$175,000.00	8/17/2020	Pre- Petition
3803	Ava (fka Eve)	Eve Nevada, LLC	\$227,500.00	5/31/2021	Admin Claim
3808	After We Collided	After II Movie, LLC	\$227,500.00	5/31/2021	Admin Claim
3804	The Second	Wonder One, LLC	\$226,250.00	5/31/2021	Admin Claim
3804	Disturbing the Peace	Wonder One, LLC	\$201,250.00	5/31/2021	Admin Claim

5. WHEREAS, on April 30, 2021, the Effective Date of the Plan occurred, and the Plan was consummated; and

6. WHEREAS, pursuant to Fed. R. Bankr. P. 7041 and Fed. R. Civ. P. 41(a)(1)(A)(ii) and/or 41(a)(2), MCCs Voltage Holdings, LLC; Union Patriot Capital Management, LLC; Venice PI, LLC; Bedeviled, LLC; MON, LLC; Colossal Movie Productions, LLC; WWE Studios Finance Corp; TBV Productions, LLC; Rise Up, LLC; Status Update LLC; Morgan Creek Productions, Inc.; Shock and Awe, LLC; Definition Delaware LLC; Fun Mom Dinner, LLC; Dead Trigger Movie, LLC; YAR Productions, Inc.; Gunfighter Productions, LLC; Ace in the Hole Productions, LP; SF Film, LLC; The Rest of Us, Inc.; Dallas Buyers Club, LLC; Eve Nevada, LLC; After II Movie, LLC; Wonder One, LLC and Debtors (collectively, "Parties") stipulate to the dismissal of the Voltage Claims and all known and unknown claims between the Parties with prejudice, with each Party to bear its own costs and attorneys' fees. In the interest of clarity, the parties further stipulate that no Party will seek recovery of costs or attorneys' fees against the other incurred in this contested proceeding.

DATED: New York, New York
May 5, 2025

/s/ Kerry S. Culpepper
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SO ORDERED:

Dated: New York, New York
May __, 2025

Chief Judge Martin Glenn
United States Bankruptcy Judge